

TUCKER ELLIS LLP
Howard A Kroll - SBN 100981
howard.kroll@tuckerellis.com
515 South Flower Street
Forty-Second Floor
Los Angeles, CA 90071-2223
Telephone: 213.430.3400
Facsimile: 213.430.3409

Attorneys for Plaintiff
VERRAGIO, LTD

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

VERRAGIO, LTD

Plaintiff,

v.

KIEU HANH JEWELRY,

Defendant.

) Case No. 8:15-cv-0688 CJC (DFMx)

) **DECLARATION OF HOWARD A.
KROLL IN SUPPORT OF REQUEST
TO CLERK TO ENTER DEFAULT**

) Hon. Cormac J. Carney

I, Howard A. Kroll, declare:

1. I am a partner at Tucker Ellis LLP, and represent Plaintiff Verragio ("Plaintiff") in the above-captioned matter. I submit this declaration in support of Plaintiff's Request for Clerk to Enter Default against Kieu Hanh Jewelry on the grounds that Defendant failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. The statements made in this declaration are based on my own personal knowledge or records regularly maintained in the ordinary course of Tucker Ellis's business, and if sworn as a witness I could testify competently thereto.

2. The Summons, Complaint and related documents were served on Defendant on May 5, 2015. *See* Docket No. 11.

3. Pursuant to Fed. R. Civ. P. 12(a), Defendant was required to serve its answer within 21 days after being served with the Summons and Complaint. The deadline for

1 Defendants to answer, therefore, was May 26, 2015. Defendant has not filed its answer
2 or any responsive papers.

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4 I declare under penalty of perjury that the foregoing is true and correct, and that
5 this declaration is executed on June 3, 2015 in Los Angeles, California.

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7 /s/Howard A. Kroll

8 Howard A. Kroll
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